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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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April 20, 1995

Mr. Randall P. Tulee
Policy Analyst
Yakama Indian Nation
1933 Jadwin Avenue Suite 110
Richland, WA 99352



Dear Mr. Tulee:

The Washington State Department of Ecology (Ecology) is pleased to receive your comments on the Remedial Investigation/Feasibility Study Work Plan for the 200-UP-1 Groundwater Operable Unit, Hanford Site, Richland, Washington (Work Plan). Your comments and questions are addressed in this letter. 282711

As you are aware, the recent Tri-Party Agreement (TPA) incorporated many aspects of the groundwater remediation (e.g., pilot-scale pump and treat for uranium and technetium, as well as lab and bench studies for the nitrate removal of the IRM plumes in the 200-UP-1 groundwater operable unit, etc.) in order to accelerate the groundwater remediation at Hanford. The initial copy of the 200-UP-1 Work Plan did not cover many aspects of the new TPA agreements. The results of the recent TPA negotiations, related to the 200-UP-1 were finally incorporated in the revised Work Plan. As you know, some of the related groundwater issues are still being discussed by the three-parties, stake holders, Hanford Advisory board, and public, under the "refocusing of the environmental restoration program." Any future changes to the work plan that might arise as a result of these discussions will be made accordingly.

The 200-West Groundwater Aggregate Area was divided into two operable units based mainly on the hydrogeology of the area. The northern part of the 200-West area is designated as the 200-ZP-1 groundwater operable unit, while the southern part is designated as 200-UP-1. A similar approach is made for the 200-East area. The details of these divisions are described in the groundwater Aggregate Area Management Study Reports (Rev. 0, DOE/EL-92-16, Rev.0, DOE/RL-92-19). In order to accelerate the process of groundwater remediation, the 200-UP-1 Work Plan is designed to investigate the vertical and horizontal distribution of contaminants in groundwater, and to implement interim actions to begin remediation of contaminants known to exceed appropriate standards using known and available technology. 265711

Since we have yet to get a clear picture of all the contaminants of concern, the natural resource damage assessment of the area at this point would not be fruitful. Regarding the remediation scenario, the future site uses working groups recommendation will be considered in the proposed plan and in the final Record of Decision (ROD).

Response to "Detailed Comments"

1. As stated above, the purpose of the 200-UP-1 Work Plan is to investigate the vertical and horizontal distribution of contaminants in the operable unit and to implement interim actions to begin remediation of contaminants known to exceed appropriate standards. With this in mind, the principal data collection efforts are focused on better defining the physical and chemical properties of specific areas where remediation is expected to occur and, as a secondary objective, additional data gathering activities are focused to provide information on the nature and extent of contamination for areas in which limited data exist and where potential need for remediation is uncertain.
2. The scientific explanations related to the Work Plan are written as readable as possible. Due to the complicated nature of the problem associated with this operable unit, some of these explanations may be difficult to understand for people with no background in specific field(s). However, every effort was made to make the revised document as understandable as possible for readers of diverse groups to understand.
3. Both human health and ecological risk assessments will be carried out, and the data will be presented in the forthcoming feasibility study and risk assessment reports.
4. All the available information was evaluated in the 200-West Aggregate Area Management Study Reports (Rev. 0, DOE/RL-92-16), and the data gaps were identified. As you mentioned, the tracer tests are presently being used to carry out various tests, such as the vertical extent of contamination, etc.
- 5 and 6. As stated above, implementation of the work plan is expected to meet all the data gaps required to identify the extent of each contaminants of concern. The final remediation strategy will be identified in future feasibility study report.
7. Please see comment no. 3.
8. The cultural and archeological surveys in different parts of the Hanford site are presently ongoing. All the activities planned under this work plan are within the boundary of the 200 West area of operation. Any risk to any cultural and archeological sites will be evaluated accordingly.

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9. Groundwater contamination is being addressed in the Work Plan for all contaminants of concern in the 200-UP-1 groundwater operable unit, regardless of source. Evaluation of groundwater contamination, by its nature, takes into account the cumulative contamination in the area.

Ecology appreciates your input on the 200-UP-1 Work Plan. If you have any questions, please feel free to call me at (509) 736-3015.

Sincerely,



Dib Goswami
Unit Manager
Nuclear Waste Program

DG:mf

cc: Paul Pak, USDOE
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Administrative record (200-UP-1 OU)

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Subject: REMEDIAL INVESTIGATION/FEASIBILITY STUDY WORK PLAN FOR THE
200-UP-1 GROUND OPERALBE UNIT HANFORD SITE

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